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16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 **PLAINTIFF WAYMO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL ITS LETTER BRIEF TO  
COMPEL STROZ-RELATED  
DISCOVERY**

23 vs.

24 UBER TECHNOLOGIES, INC.;  
25 OTTOMOTTO LLC; OTTO TRUCKING  
26 LLC,

27 Defendants.

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1 Pursuant to Civil L.R. 7-11 and 79-5, Plaintiff Waymo LLC (“Waymo”) respectfully requests  
 2 to file under seal information in its Letter Brief to Compel Stroz-Related Discovery (Waymo’s Letter  
 3 Brief”), filed concurrently herewith. Specifically, Waymo requests an order granting leave to file  
 4 under seal the portions of the documents as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Letter Brief	Highlighted in blue	Defendants
Exhibit 1 to Waymo’s Letter Brief	Entire document	Defendants
Exhibit 2 to Waymo’s Letter Brief	Entire document	Defendants
Exhibit 3 to Waymo’s Letter Brief	Entire document	Defendants
Exhibit 4 to Waymo’s Letter Brief	Entire document	Defendants
Exhibit 5 to Waymo’s Letter Brief	Entire document	Defendants
Exhibit 7 to Waymo’s Letter Brief	Entire document	Defendants
Exhibit 8 to Waymo’s Letter Brief	Entire document	Defendants
Exhibit 9 to Waymo’s Letter Brief	Entire document	Defendants
Exhibit 10 to Waymo’s Letter Brief	Entire document	Defendants

12 **I. LEGAL STANDARD**

13 Civil Local Rule 79-5 requires that a party seeking sealing “establish[] that the document, or  
 14 portions thereof, are privileged, protectable as a trade secret or otherwise entitled to protection under  
 15 the law” (*i.e.*, is “sealable”). Civil L.R. 79-5(b). The sealing request must also “be narrowly tailored  
 16 to seek sealing only of sealable material.” *Id.*

17 **II. DEFENDANTS’ CONFIDENTIAL INFORMATION**

18 Waymo seeks to seal these documents only because Defendants have designated the  
 19 information confidential and/or highly confidential. Declaration of Lindsay Cooper (“Cooper Decl.”)  
 20 ¶ 3. Waymo takes no position on the merits of sealing Defendants’ designated material, and expects  
 21 Defendants to file one or more declarations in accordance with the Local Rules.

22 **III. CONCLUSION**

23 In compliance with Civil Local Rule 79-5(d), redacted and unredacted versions of the  
 24 above listed documents accompany this Administrative Motion. For the foregoing reasons,  
 25 Waymo respectfully requests that the Court grant Waymo’s Administrative Motion.

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1 DATED: October 12, 2017

2 QUINN EMANUEL URQUHART & SULLIVAN,  
3 LLP

4 By /s/ Charles K. Verhoeven

5 Charles K. Verhoeven  
6 Attorneys for WAYMO LLC

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